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Interlink Products International, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

INTERLINK PRODUCTS
INTERNATIONAL, INC. and ELI
ZHADANOV,

Plaintiffs,

v.

HOMEWERKS WORLDWIDE, LLC,

Defendant.

Case No: 2:19-cv-11751

**COMPLAINT &
JURY TRIAL DEMAND**

Plaintiffs, Interlink Products International, Inc. (hereinafter “Interlink”) and Eli Zhadanov (“Zhadanov”) (collectively, “Plaintiffs”), by and through their undersigned attorney, hereby complain of Defendant, Homewerks Worldwide, LLC (“Defendant”), as follows:

THE PARTIES

1. Interlink is a New Jersey corporation with its principal place of business at 1315 East Elizabeth Avenue, Linden, New Jersey 07036.

2. Zhadanov is an individual residing at 2944 W. 5th Street, Brooklyn, New York 11224.

3. On information and belief, Defendant is an Illinois limited liability company with its principal place of business at 55 Albrecht Drive, Lake Bluff, Illinois 60044.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the claims alleged pursuant to 28 U.S.C. §§ 1331 and 1338.

5. This Court also has jurisdiction over the claims alleged pursuant to 28 U.S.C. § 1332. The amount in controversy exceeds \$75,000 and complete diversity exists between Plaintiff and Defendant.

6. This Court has personal jurisdiction over Defendant in that Defendant has consented to litigating the matters at issue in this lawsuit in this forum. This Court further has personal jurisdiction over Defendant in that Defendant does business regularly in this district and the claims at issue in this case arise out of or are related to Defendant's business activities with respect to this district. On information and belief, Defendant regularly places the product at issue into the stream of commerce through established relationships with one or more retailers selling the product in New Jersey and with full awareness that substantial quantities of the product will be sold in New Jersey. Defendant thus purposely directs its business activities to this forum and the claims herein arise out of and relate to such business activities.

7. Venue is proper in this district pursuant to the forum selection clause in the contract at issue and 28 U.S.C. § 1391(b) and (c).

**CLAIM FOR BREACH OF SETTLEMENT
AGREEMENT**

8. On October 23, 2012, United States Letters Patent No. 8,292,253 (“the ’253 Patent”) were issued to Eli Zhadanov, Interlink’s President and majority shareholder. In general terms, the ’253 Patent describes an invention centering on a mounting bracket with an adhesive backing (used to attach the bracket to a wall) for mounting a suction-based shower accessory and thereby allowing the accessory to be installed on surfaces that otherwise would not permit or be ideal for attachment to a suction device.

9. Interlink is the exclusive licensee of the ’253 Patent.

10. On or about May 24, 2016, Plaintiffs entered into a settlement agreement with Defendant with respect to Plaintiffs’ allegation that Defendant had infringed the claims of the ’253 Patent (the “Settlement Agreement”).

11. Defendant breached the settlement agreement causing Interlink damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment in its favor and against Defendant and its subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with Defendant, granting the following relief:

- A. An award of damages sufficient to compensate Interlink for Defendant’s breach, including, without limitation, Interlink’s lost profits;
- B. A preliminary and permanent injunction prohibiting the action constituting the breach; and
- C. Such other and further relief as this Court or a jury may deem proper and just.

Dated: April 29, 2019

Respectfully submitted,

The Law Office Of
JASON B. LATTIMORE, ESQ. LLC

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*Attorneys for Plaintiff
Interlink International Products, Inc.*

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff demands a trial by jury on all issues triable by jury.

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*Attorneys for Plaintiff
Interlink International Products, Inc.*

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

The undersigned hereby certifies that, to the best of his knowledge, this matter is not the subject of any other action pending in any court, or any pending or contemplated arbitration or administrative proceeding.

Dated: April 29, 2019

Respectfully submitted,

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